



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. **3:20cr91 DCB-FKB**

RUI PING LIN and  
RED SAMURAI SUSHI, INC.

8 U.S.C. § 1324(a)(1)(A)(iii)

**The United States Attorney charges:**

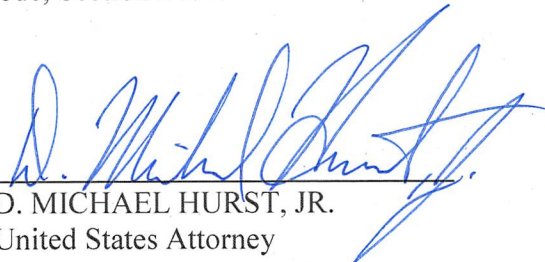
On or about March 2014 through February 2017, in Madison County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **RUI PING LIN and RED SAMURAI SUSHI, INC.**, knowing and in reckless disregard of the fact that aliens, namely, "A.D.S.," "D.G.P.," "J.C.P.," "J.S.L.," and others known and unknown to the Grand Jury, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places and by means of transportation for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offenses as alleged in this Information, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offense, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has

been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Section 982(a)(6); Title 8, United States Code, Section 1324(b); and Title 28, United States Code, Section 2461.



D. MICHAEL HURST, JR.  
United States Attorney